

Richard Renner

From: Richard Renner
Sent: Wednesday, January 11, 2017 9:30 AM
To: mkletzkin@dclawfirm.com
Cc: George Chuzi
Subject: MWAA litigation hold on behalf of Kenneth H. Pritchard
Attachments: Richard R Renner.vcf

Dear Mr. Kletzkin:

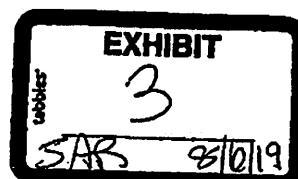
On behalf of my client, Mr. Kenneth H. Pritchard, this email is to request that your client, the Metropolitan Washington Airports Authority (also called the "Authority") (1) return to my client all personal property and records left at the Authority's premises when my client was placed on administrative leave, and (2) issue a litigation hold on all hardcopy documents, emails, text messages, electronically stored information (ESI) and other records that could contain evidence relevant Mr. Pritchard's employment claims.

As to the request for the return of personal property, please notify me of the soonest possible date, time and place when my client may recover his personal property and records left at the Authority's premises on November 29, 2016, when he was placed on administrative leave. Note that Mr. Pritchard had personal documents in his office, and he does want the opportunity to review the contents of his office to be sure he has all his personal records and property. Please let me know what dates, times and places would be suitable for this.

As to the litigation hold, I ask that you place a hold on all records dated since January 1, 2011, that refer to (a) my client in any way, (b) any concerns that he raised, or (c) any employment action affecting my client or in which my client participated. In addition, please hold documents, ESI (including text and email messages) and other records constituting or referencing the creation, review, sign-off or acknowledgement of Requests for Personnel Action and Notifications of Personnel Action since January 1, 2011. I also ask that everything that was in my client's office or other workspaces on the morning of November 29, 2016, be preserved, except for those items that are actually returned to my client pursuant to this request. My client's workspace includes, but is not limited to, the office suite hallway adjacent to his immediate office and includes all hardcopy documents, job description books, and other records kept in this office suite hallway.

I ask that the litigation hold apply to hardcopy documents, emails, text messages, electronically stored information (ESI) and other records sent, received or held by any of the following individuals, or any mobile device used by any of the following individuals:

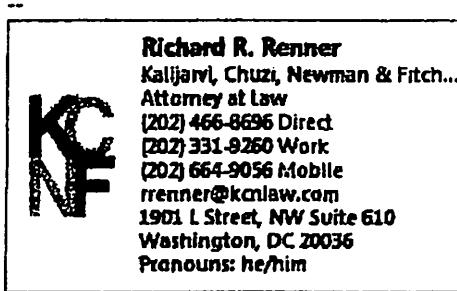
1. John E. "Jack" Potter
2. Anthony J. "Tony" Vegliante
3. Sam Pulcrano
4. Tanisha Lewis
5. Deborah Lockhart
6. Amine Moussa
7. Gail Endicott
8. Pete Delate
9. Jennifer Howard
10. Michael Rumberg
11. Nancy Robinson
12. Melinda Crawford
13. Marcelene Wesley
14. Warren Reisig



15. Michael Brogan
16. Janet Carpenter
17. Kevin Jones
18. Margaret E. McKeough
19. Arl B. Williams
20. Kenneth H. Pritchard
21. All Employment Specialists and HR Technicians of MA-510 employed on or after January 1, 2011
22. All MWAA Board members who served for any time since January 1, 2011
23. All Secretaries to the Board who served for any time since January 1, 2011

I ask that images be made of any hard drives, mobile devices, and archives that would have any ESI described in this request (so that deleted files and information would be preserved). Please instruct your client that its personnel are not to use, save files to, erase, delete or otherwise alter any hard drives, mobile devices, archives or other ESI until such images are completed and preserved. Otherwise, even ordinary use of such devices could cause the loss of retrievable data.

Thank you for your attention to this request.



[Website](#) · [Blog](#) · [Facebook](#) · [LinkedIn](#)